

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:) Chapter 7
) No. 16-39654
) (Jointly Administered)
ARGON CREDIT, LLC, *et al.*,) Hon. Deborah L. Thorne
) Hearing Date: March 23, 2023
) Debtors. Hearing Time: 9:30 a.m.

NOTICE OF LIMITED OBJECTION

PLEASE TAKE NOTICE that Fund Recovery Services, LLC (“FRS”) has a limited objection to the *Motion For Entry Of An Order: (I) Pursuant To Bankruptcy Rule 9019 Approving Settlement with Little Owl Argon, LLC, and (II) Approving Payment of Contingency Fee* [ECF No. 574] (“Motion”), which is scheduled for presentment on **March 23, 2023 at 9:30 a.m.** or as soon thereafter as counsel may be heard, before the **Honorable Deborah L. Thorne**, Bankruptcy Judge, or in her absence, before such other Judge who may be sitting in her place and stead and hearing bankruptcy motions. Specifically, FRS objects to the Motion to the extent that it may impair FRS’s rights under that certain *Amended and Restated Subordination Agreement* dated February 12, 2016 between FRS’s predecessor in interest, the above-captioned debtors, and Little Owl Argon, LLC (“Little Owl”), including, without limitation, FRS’s right to collect any distribution made on account of Little Owl’s allowed claim in this case.

FUND RECOVERY SERVICES, LLC

By: /s/ Peter J. Roberts
One of its attorneys

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CERTIFICATE OF SERVICE

Peter J. Roberts certifies that he caused to be served a true copy of the above and foregoing notice upon the attached Electronic Mail Notice List through the ECF System which sent notification of this filing on March 21, 2023.

/s/ Peter J. Roberts

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